

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Aaron Abadi, : Case No.: 1:23-cv-04033-LJL
Plaintiffs, : **DECLARATION IN SUPPORT OF**
: **EVA AIRWAYS CORPORATION'S**
: **MOTION TO DISMISS**
-against- :
American Airlines Group, Inc., *et al.*, :
Defendant. :
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I, Tracy Ma, hereby declare and state as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration.
2. I am employed with EVA Airways Corporation ("EVA") in its Customer Service Department, America Head Office, located in El Segundo, California. I have been employed by EVA for a total of 32 years. As a result of my employment, I am fully familiar with EVA's business operations.
3. I submit this Declaration in support of EVA's Motion to Dismiss plaintiff's Complaint.
4. EVA is a corporation organized and existing under the laws of Taiwan, Republic of China. EVA's headquarters and principal place of business are located in Taiwan.
5. EVA has never maintained a principal place of business in any state in the United States, including New York or Texas.
6. Attached as Exhibit 44 to plaintiff's Complaint are copies of two email communications sent by Queena Chen in EVA's Customer Service Department. These emails were sent by Ms. Chen from EVA's America Head Office, located in El Segundo, California.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on 12 January 2024



A handwritten signature in blue ink, appearing to read "Tracy Ma", is written over a blue horizontal line. The signature is fluid and cursive, with the name "Tracy" on the left and "Ma" on the right, separated by a small gap.